

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

Consumer Financial Protection
Bureau,

Plaintiff,

v.

D and D Marketing, Inc., d/b/a
T3Leads, *et al.*,

Defendants.

Case No. 2:15-cv-09692-PSG(Ex)

(consolidated for pretrial purposes with Case
Nos. 2:16-cv-02724-PSG(Ex) and 2:16-cv-
02725-PSG(Ex))

**STIPULATED FEDERAL RULE OF
EVIDENCE 502(d) ORDER**

This matter having come before the Court pursuant to Federal Rule of
Evidence 502(d), and Plaintiff Consumer Financial Protection Bureau (the “CFPB”
or “Bureau”) and Defendants D and D Marketing, Inc. d/b/a T3Leads (“T3”), Marina
Demirchyan, Grigor Demirchyan, Dmitry Fomichev, and Davit Gasparyan (a/k/a
David Gasparyan) (“Defendants” and collectively with the CFPB the “Parties” or
individually as “Party”) having stipulated to the relief set forth herein, it is hereby
ORDERED:

1 The production of privileged or work-product-protected documents,
2 electronically stored information (“ESI”), or other information, whether inadvertent
3 or otherwise, is not a waiver of the privilege or protection from discovery in this case
4 or in any other federal or state proceeding. This Order shall be interpreted to provide
5 the maximum protection allowed by Federal Rule of Evidence 502(d).

6 Nothing contained herein is intended to or shall serve to limit a Party’s right to
7 conduct a review of documents, ESI, or other information (including metadata) for
8 relevance, responsiveness, or segregation of privileged or protected information
9 before production.

10
11
12 FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

13
14 DATED: _____

15
16 _____
17 HON.